BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, DC 20554

CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006 OF CENTENNIAL USVI OPERATIONS CORP. D/B/A CENTENNIAL

EB-06-TC-060 / WC DOCKET NO. 06-36

Pursuant to the recent Public Notice¹ issued by the Enforcement Bureau asking all telecommunications carriers to file with the Commission by February 6, 2006 the customer proprietary network information ("CPNI") compliance certificates required under section 64,2009(e) of the Commission's rules, Centennial USVI Operations Corp. d/b/a Centennial hereby submits the following certificate and statement.

I, Ricardo Espina, Vice President of Marketing and Sales, Centennial USVI Operations Corp. d/b/a Centennial hereby certify that I have personal knowledge that Centennial USVI Operations Corp. has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, found at 47 C.F.R. Pt. 64, Subpt. U. Attached to this certificate is a statement explaining how the operating procedures of Centennial USVI Operations Corp. ensure that it is in compliance with the Commission's CPNI rules.

Ricardo Espina

Vice President of Marketing and Sales

Centennial USVI Operations Corp. d/b/a Centennial

¹ Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications, Public Notice, DA 06-223 (EB rel. Jan. 30, 2006); *see also* Enforcement Bureau Opens New Docket for the February 6, 2006, Filing of CPNI Compliance Certifications (EB Docket No. 06-36), Public Notice, DA 06-258 (EB rel. Feb. 2, 2006).

STATEMENT CONCERNING PROCEDURES ENSURING COMPLIANCE WITH CPNI REGULATIONS

The operating procedures and practices of Centennial USVI Operations Corp. d/b/a Centennial ("Centennial USVI") ensure that Centennial USVI complies with the Commission's rules at 47 C.F.R. § 64.2001, *et. seq.*, governing the use of customer proprietary network information ("CPNI"). Compliance with such rules is demonstrated by the policies and practices employed by Centennial USVI, a brief explanation of which is provided below.

First, Centennial USVI only provides one category of services to its customers—commercial mobile radio service or "CMRS"—and it does not use any CPNI in the marketing of its services. Centennial USVI's services are sold through advertisements and personal contact with customers and potential customers visiting sales locations. (Should Centennial USVI expand its business to include other categories of service, it will implement a system to clearly establish the status of a customer's CPNI approval prior to any use of, disclosure of or permitting access to its customers' CPNI.)

Second, Business Solutions does not disclose CPNI to, or permit access to CPNI, by third parties except as may be required by law (such as when CPNI is requested pursuant to a valid subpoena, court order, search warrant or national security letter), as is necessary for the provision of the broadband service itself, or in connection with the use of contract workers. In any case, any third parties to which CPNI is disclosed or who are given access to CPNI are only given access to appropriate CPNI for the third party's purpose, and only after executing a confidentiality agreement or pursuant to the terms of a valid subpoena, court order, etc.

Third, Centennial USVI employs a variety of operating procedures to ensure compliance with CPNI regulations. Such procedures include:

- 1. Centennial USVI provides all employees with a copy of its corporate privacy policy, which is contained in a document entitled "Code of Conduct." The Code of Conduct instructs employees to not disclose any customer account information to anyone, except as authorized by law and to seek advice from the legal department if the employee has a question regarding the validity of a subpoena, court order, etc. to disclose customer information. Moreover, sales and customer service employees receive additional instruction on the proper handling of confidential customer information.
- 2. Centennial USVI has a disciplinary program to ensure compliance with its operating procedures, including procedures for handling customer confidential information. Its disciplinary program includes a variety of penalties for the violation of privacy procedures, including the termination of employment where appropriate.
- 3. Centennial USVI maintains records of those occasions where CPNI is released to third parties (such a release occurring pursuant to a valid subpoena), which are retained for at least one year.